

## II. REMARKS

1. Claims 1-26 remain in the application. Claims 27-32 have been cancelled without prejudice.

2. Applicants respectfully submit that claims 1-3, 5-7, 9-12, 14-21, 23, 25 and 26 are patentable over the combination of Filler et al. (WO 00/11827, "Filler") in view of Yu et al. (US 6,684,087, "Yu").

The combination of Filler and Yu fails to disclose or suggest the following features of claim 1:

identifying a user of a cellular mobile phone in the communication network from subscriber identity information of the user in the cellular mobile communication network; and

associating a digital collectible trading card with the user based on the subscriber identity information of the user in the cellular mobile communication network received from the cellular mobile phone.

The combination of Filler and Yu also fails to disclose or suggest the following features of claim 21:

a server communicating with a cellular mobile phone via the cellular mobile communication network for storing the digital collectible trading card and for associating the user with the digital collectible trading card, wherein the associating is based on subscriber identity information of the user in the cellular mobile communication network received from the cellular mobile phone.

Applicants find no disclosure in the combination of Filler and Yu related to identifying a user of a cellular mobile phone from subscriber identity information in the cellular mobile communication network, as recited in claim 1.

Applicants further submit that there is no disclosure in the cited references related to associating a digital collectible trading card with the user based on the subscriber identity information of the user received from the cellular mobile phone, as recited in claims 1 and 21.

In the present invention the user is able to use the digital trading card system with his mobile with less effort than in solution based on Filler. Namely, because he does not need to enter the user identification and the corresponding password - he benefits from the cellular identification of the mobile in the cellular network which uniquely identifies himself as a user. This cellular user identification is used in the invention to associate the user to his digital trading card. As a comment to Examiner's grounds for rejection on page 2 of the Office Action, the Ethernet identification of Filler does not identify the user.

Similarly, Yu does not provide a solution to the above-identified problem. In Yu association only takes place as a result of a very detailed and definite request explicitly made by the user.

According to Yu, a user identifier is only used for finding a certain user account (already existing at the image server) and for generating certain instructions, according to which an image will be pre-processed in a proxy server. Associating an image with a user, which is the closet Yu ever gets to the present

applicant's concept of associating a digital collectible trading card with the user, only takes place in Yu as a result of a very detailed and definite request explicitly made by the user. Thus, there is no associating digital information of the user based on the subscriber identity of the user in the cellular mobile communication network received from the cellular mobile phone. Although Yu includes the words "subscriber ID," the subscriber ID of Yu is created and administered by a carrier administering link server 300 as part of the procedure for activating the account. The advantageous way of utilizing the cellular subscriber identity of the user in the cellular mobile communication network for associating the card is missing. Thus, the features of the present invention are still missing from Yu and Filler.

Referring to page 3 of the Office Action, the Office states that normally the phone number, the phone's SIM number on a GSM system, or both, identifies the user. However, there is nothing in Filler or Yu that suggests or discloses this feature. The system of Yu as realized does not appear to utilize this feature. In the invention the system of the trading card can take advantage of the user id in the cellular network.

Considering that the trading cards is a popular activity, in particular among youngsters and children, the above identified easy and more automatic access, identification and association of the trading card to the user is a clear improvement with respect to the solution proposed by Filler and Yu.

Also, Applicants still note that Yu never even approaches the subject of handling digital collectible trading cards: the subject of Yu is simply handling some general form of digitally represented images. Applicant respectfully disagrees that the

data of Yu is synonymous to the collectible digital trading card of the present invention. Yu teaches too general a concept, and therefore the motivation and instructions for a skilled person to make the combination is lacking. The trading card can have an image. However, the trading card must have more information than a mere image, i.e. an image of a Pokemon character identifying the Pokemon trademark etc. Furthermore, as identified in the application, the digital trading card can be without any kind of image, i.e. a football player's name with his score statistics. Accordingly, the information which the digital trading card contains, is of great importance when identifying the trading card. The mere image could never as such be the same.

At least for these reasons, Applicants respectfully submit that claims 1 and 21 are patentable over the combination of Filler and Yu.

Claims 2, 3, 5-7, 9-12, 14-20, 23, 25, and 26 depend from claim 1 or from claim 21 and therefore are also patentable over the combination of Filler and Yu.

3. Applicants respectfully submit that claim 4 is patentable over the combination of Filler, Yu and Beuk et al. (US 5,774,673, "Beuk").

Claim 4 depends from claim 1. Beuk fails to provide the features of claim 1 missing from the combination of Filler and Yu and therefore fails to render claim 4 unpatentable.

4. Applicants respectfully submit that claim 13 is patentable over the combination of Filler, Yu, and Peppel (US 6,200,216).

Claim 13 depends from claim 1. Peppel fails to provide the features of claim 1 missing from the combination of Filler and Yu and therefore fails to render claim 13 unpatentable.

5. Applicants respectfully submit that claims 8 and 24 are patentable over the combination of Filler, Yu and Treyz et al. (US 6,587,835), "Treyz").

Claim 8 depends from claim 1 and claim 24 depends from claim 21. Treyz fails to provide the features of claims 1 and 21 missing from the combination of Filler and Yu and therefore fails to render claims 8 and 24 unpatentable.

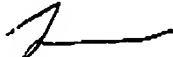
6. Applicants respectfully submit that claim 22 is patentable over the combination of Filler, Yu, and Atsmon et al. (US 6,607,136, ("Atsmon")).

Claim 22 depends from claim 21. Atsmon fails to provide the features of claim 1 missing from the combination of Filler and Yu and therefore fails to render claim 22 unpatentable.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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7/5/05

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